

TRULINCS 44202086 - MODELESKI, MITCHELL PAUL - Unit: SPG-G-P

FROM: 44202086

TO: Brown, Thomas; Coakley, Mike; Guenette, Edward; Mullen, Jack; Saccato, Larry; Schoen, Juan

SUBJECT: MOTION IN LIMINE AND FOR SANCTIONS

DATE: 11/30/2014 11:49:08 AM

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U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2014 DEC 8 PM 1 29  
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CHEYENNE

MOTION IN LIMINE AND FOR SANCTIONS:

FRCrP Rules 2, 16; FREV Rule 201(c)(2);  
Fourth and Fifth Amendments

Case Number: 2:14-CR-00027-NDF aka 14-CR-27-F

TO:

Office of Presiding Judge  
(NOT Nancy Dell Freudenthal)  
U.S. District Court  
2120 Capitol Avenue, 2nd Floor  
Cheyenne 82001  
Wyoming, USA

DATE: 11/30/2014

SUBJECT: barratry and "churning" (fee generation)

Ladies and Gentlemen, Boys and Girls:

I am now informed by Mr. Thomas A. Fleener, Docket #252, that  
"discovery includes 14 computers and 11 external hard drives,  
containing over 12,000 emails, 13.5 hours of recordings (audio  
and video), over 14 gigabytes of data and over 100,000 pages  
of digital materials" (Page 2, Paragraph 6).

I am now informed by Mr. Thomas B. Zubin, Docket #248, that  
"discovery [of] 14.03 Gigabytes of material is equivalent to  
approximately 350 banker boxes of pages, with an estimated  
2500 pages per box, or 875,000 pages of material"  
(Page 2, Paragraph 4). His arithmetic is correct.

See also Docket #246 ("all defendants are not detained" ?? )  
Gee, I went from being a "critical defense witness," now  
I don't exist. WOW! How did Mr. Reese do THAT?

Let me get this straight:

I have been variously accused of "inundating" Court personnel  
with one (1) set of Exhibits appended to a REQUEST TO APPEAR  
IN WRITING: 18 U.S.C. 1504. See last paragraph in section 1504,  
in particular, as explained at 18 USCS 1504 (LexisNexis CD).

We mailed those Exhibits to the Foreperson, on behalf of Mr. Hill's clients,  
expressly to eliminate unnecessary duplication of those Exhibits by his clients.

Where are those Exhibits now, please?

I, for one, would like to weigh them on a common bathroom scale,  
and certify the weight in front of competent witnesses. (P.S.  
they all fit inside a single Flat Rate Priority U.S. Mail box).

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I suspect that those same Exhibits were NEVER conveyed to any Foreperson, because Mr. L. Robert Murray, and possibly also Mr. Christopher Crofts, decided to INTERCEPT those Exhibits, and then CONCEAL them from a lawfully convened Federal grand jury (NOT one that discriminates against State Citizens aka Citizens of ONE OF the United States of America: see 28 U.S.C. 1865(b)(1): federal citizens ONLY!)

Here, see In re Grand Jury Application (USDC/SDNY), as previously cited in the Court's Docket records.

I first started using computers in the Summer of 1971 A.D. This is 2014 A.D. I now have 43+ YEARS of experience using and developing advanced computer systems:

<http://www.supremelaw.org/authors/mitchell/resume.htm>

I'm very competent and NOT "delusional", protestations and obvious falsehoods by one Cynthia A. Low to the contrary notwithstanding. "Ph.D." -- REALLY?

Mr. Murray and his several corrupt henchmen are being ludicrous, and they are also committing barratry.

For example, an exact copy of an entire Microsoft Windows drive letter can be efficiently written to any other MS Windows drive letter, even networked drives, using XCOPY in Command Prompt e.g. to copy any folder and all sub-folders: XCOPY folder X:\folder /s/e/v/d , where "X:" is the destination drive letter.

Forcing all defense Counsel to install the "FTK Imager software" only serves to prove how utterly stupid and demonstrably perverse Mr. Murray's henchmen have become. Hey, when you've got \$1 TRILLION in CASH sloshing around in off-shore accounts, LET'S PARTY!

<http://www.supremelaw.org/press/rels/kickback.htm>  
<http://www.supremelaw.org/sls/31answers.htm>

Can you say "obfuscation" with a straight face? I can't!

On a note of obvious simplicity and utter practicality, I believe the OUSA should be required -- within 10 days -- to produce a complete list of all witnesses and all prosecution Exhibits, and be barred from introducing anything else during trial. See FRCP Rule 2; United States v. Grace, 526 F.3d 499 (9th Cir. 2008); United States v. Gregory, 508 F.Supp. 1218 (USDC/SDAL 1980); United States v. Cerna, 633 F.Supp.2d 1053 (USDC/NDCA 2009).

I also sense an ocean of ugly greed is now oozing from the pores of all defense Counsel, as they enthusiastically anticipate exorbitant fees, at "standard" rates, to browse every single item in all 350 banker boxes.

They wouldn't want to miss something juicy now, would they? (???)

Lastly, where are the four (4) Qui Tam Complaints that were illegally seized and confiscated from my private Seattle apartment on 6/11/2013?

After the raiders left, my ONE (1) banker box with those 4 Qui Tam Complaints was totally empty, and none of those documents was ever returned to me.

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The OUSA should be sanctioned for concealing the contents of that one (1) banker box, and for multiple retaliations against me in violation of 31 U.S.C. 3730(h) (cf. "special damages"), 18 U.S.C. 1513 and 3771.

As an Agent of the United States under the False Claims Act, 31 U.S.C. 3729 et seq., we hereby DEMAND that all attorneys cease and desist immediately from any and all further "churning" or barratry for the purpose of padding your bank accounts at the outrageous and unnecessary expense of your several clients and of the Treasury of the United States. See U.S. ex rel. Madden v. General Dynamics Corp. (cite omitted here).

Mr. Terry J. Harris et al., are you reading this? YES or NO? Emily Marie Harris, can you afford to take time from your 27 other "clients" to read and heed this MOTION? YES or NO?

Where are DOJ's reply and documents responsive to my FOIA Request and Appeal, Mr. Harris? (P.S. You and your entire law firm are now IN DEFAULT: 18 U.S.C. 1519.)

You should try your own medicine some day soon: if you choke on it, don't blame me. See 18 U.S.C. 2340, 2340A here, in particular.

Sincerely yours,   
/s/ Paul Andrew Mitchell, B.A., M.S. (chosen name) \*

Defendant-Appellant, Tenth Circuit #14-8081 (Denver, Colorado)

\* See Doe v. Dunning, 549 P.2d 1 (Washington State Supreme Court)  
(fundamental principle and common-law right to change one's name)

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